

● ORIGINAL ●

FILED
HARRISBURG

AUG 9 2001

MARY E. D'ANDREA, CLERK
Per
DEPUTY CLERK

The Law Offices of SPERO T. LAPPAS
205 State Street
Post Office Box 808
Harrisburg, Pennsylvania 17108-0808
(717) 238-4286

By: SPERO T. LAPPAS, Esquire
Pa. Supreme Court identification no. 25745
ATTORNEY FOR PLAINTIFF

*IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA*

CINDY L. RIGG, Plaintiff	:	
	:	CIV ACTION NO. 4:CV-01-0967
v.	:	JURY TRIAL DEMANDED
COUNTY OF DAUPHIN, DAUPHIN COUNTY SHERIFF'S DEPARTMENT, RALPH McAlister, Defendants	:	
	:	
	:	
	:	
	:	(JUDGE MCCLURE) ✓

PLAINTIFF'S MOTION FOR AN ENLARGEMENT OF TIME TO RESPOND TO
DEFENDANTS' MOTIONS UNDER RULE 12 AND FOR SUMMARY JUDGMENT,
AND FOR LEAVE TO FILE A CONSOLIDATED BRIEF

1. All defendants have filed motions to dismiss or for summary judgment seeking to dismiss the Plaintiff's complaint.
2. Defendant McAllister has not yet filed his brief, the County defendants served their brief by mail on July 24, 2001. Plaintiff's Brief in opposition to the County's Motion would be due on August 13, 2001.
3. Plaintiff desires to file one consolidated Brief at such time as her Brief in Opposition to McAllister's Motion would be due.
4. All counsel concur.

WHEREFORE, the plaintiff requests that she be granted an extension of time up to and including the time for filing her brief in opposition to McAllister's Motion to Dismiss or for Summary Judgment to file a consolidated Brief in opposition to all pending motions.

RESPECTFULLY SUBMITTED,

The Law Offices of SPERO T. LAPPAS

By:

SPERO T. MAPPAS, Esquire
Pa. Supreme Ct. ID no. 25745
205 State Street
P.O. Box 808
Harrisburg, PA 17108-0808
(717) 238-4286
ATTORNEY FOR THE PLAINTIFF

The Law Offices of SPERO T. LAPPAS
205 State Street
Post Office Box 808
Harrisburg, Pennsylvania 17108-0808
(717) 238-4286

By: SPERO T. LAPPAS, Esquire
Pa. Supreme Court identification no. 25745
ATTORNEY FOR DEFENDANT

CERTIFICATE OF CONCURRENCE

I hereby certify that on all counsel concur in this motion.

RESPECTFULLY SUBMITTED,

The Law Offices of SPERO T. LAPPAS

By:

205 State Street
P.O. Box 808
Harrisburg, PA 17108-0808
(717) 238-4286

The Law Offices of SPERO T. LAPPAS
205 State Street
Post Office Box 808
Harrisburg, Pennsylvania 17108-0808
(717) 238-4286

CERTIFICATE OF SERVICE

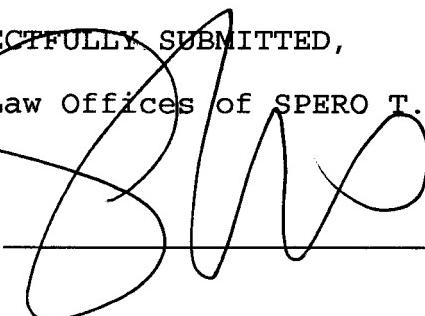
I hereby certify that on this date I served a true copy of the attached document upon the person(s) named below by mailing a copy addressed as follows, postage pre-paid, deposited into the U. S. Mail at Harrisburg, Pa.

JAMES YOUNG, ESQUIRE
LAVERY, FAHERTY, YOUNG AND PATTERSON, PC
301 MARKET STREET
HARRISBURG, PA. 17108-1245

MICHAEL KANE, ESQUIRE
KANE AND MACKIN, LLP
3300 TRINDLE ROAD
CAMP HILL, PA. 17011

RESPECTFULLY SUBMITTED,

The Law Offices of SPERO T. LAPPAS

By: 

August 9, 2001